



LEMAR Consulting, Inc.
Technology Planning, Management, Professional Development

Received & Inspected

October 27, 2014

NOV 03 2014

Letter of Appeal
Marlene H. Dortch, Secretary
FCC, Office of the Secretary
445 12th Street SW
Washington, DC 20554

FCC Mail Room

DOCKET FILE COPY ORIGINAL

Re: BADR SCHOOL
Billed Entity Number: 208844
Funding Year: 2011 (07/1/2011 - 06/30/2012)
471 Application Number: 801449
Funding Request Numbers: 2173740
CC Docket No. 02-6

We wish to appeal the Administrator's Decision on Appeal – Funding Year 2011-13 dated October 13, 2014. The letter denies our appeal regarding the Commitment Adjustment Decision indicated in the Notification of Commitment Adjustment Letter dated July 29, 2014. The Administrator's denial letter states that the device in question was only partially eligible, that the program cannot fund ineligible products, and that we "did not show that USAC's determination was incorrect."

We understand that the program will not fund ineligible goods/services, in whole or in part. That was not our argument. If the vendor simply misquoted the percentage eligibility for this product, we would not have submitted an appeal on the determination. We would not be filing this appeal. Our argument is about using the same standards when reviewing funding requests.

As a part of its bid, Interactive Digital Solutions (IDS), listed the LifeSize Team 220 (SKU 1000-0000-1130) as 92% eligible. It was reviewed as submitted and IDS was awarded the contract. The project was completed in the fall of 2013. However, after all was done and paid, we received a Notification of Commitment Adjustment Letter in July 2014 stating that the device was 75% eligible. It demanded payment from IDS. They acknowledged that they would return the requested \$911.46 but then stated that it was the school's responsibility to pay them the \$911.46 plus any difference in the revised product eligibility amount. That is when we began to look further into the details.

In our pursuit to ascertain why/when the eligibility discount changed, we had a series of exchanges and requests for documentation from the vendor who eventually passed us onto the manufacturer, LifeSize. We have attached those email exchanges as support.

During those exchanges, it became apparent that the eligibility 92% discount for this device in the IDS bid reflected the eligibility discount percentage that was promoted by LifeSize through their literature. However, that discount was falsely promoted. It was, as it turns out, 75%.

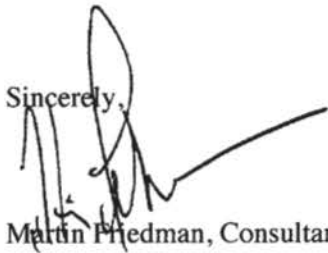
Additionally, it appears that the SLD and LifeSize had several contacts at that time, through the PIA review process. The LifeSize person informed us that they worked directly with the SLD to assure the 92% eligibility but, since we made a Correctional SPIN Change, we slipped through the cracks. Her email

stated: "One thing to consider is that the discount percent moved from 75% to 92% in late 2011. If indeed this was a SPIN change then the SLD went back to the original eligibility of 75% which would have been in effect when the original 471 was completed. If this would have gone through the regular PIA review I would have been able to have the discount changed the 92%."

Our regular PIA review used the submitted IDS bid with LifeSize equipment and approved it at the 92%, however that was irrelevant. Since she was not able to intercept the review, we were out of luck and would be hung for the difference in cost.

It is obvious, that the eligibility discount for the LifeSize product was misrepresented in early 2011. Yet, according to the manufacturer, not only was that eligibility discount change that same year but all 2011-12 applicants for this product were granted the 92% eligibility, except for BADR. If, in fact, the SLD did perform the discount eligibility changes described above, and in the attached documentation, then that same accommodation must be provided to BADR.

Sincerely,



Martin Friedman, Consultant, BADR School

Attachment:

Letter of Appeal to USAC, September 16, 2014

Email exchanges with LifeSize

Administrator's Decision on Appeal – Funding Year 2011-12, October 13, 2014

BADR School
539 Bergen Avenue
Jersey City, NJ 07304
(201) 435-1075

Received & Inspected

NOV 03 2014

FCC Mail Room

September 16, 2014

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
100 Jefferson Street
PO Box 902
Whippany, NJ 07981

Re: BADR School
Billed Entity Number: 208844
Funding Year: 2011 (07/1/2011 - 06/30/2012)
471 Application Number: 801449
Funding Request Number: 2173740

We wish to appeal the Commitment Adjustment Decision indicated in the Notification of Commitment Adjustment Letter dated July 29, 2014.

The explanation provided was, "after multiple requests for documentation and application review, it was determined that the funding commitment for this request must be reduced by \$2,563.72," reflecting 90% of the total ineligible amount of \$2,848.57. The original Funding Commitment was \$23,380.76. The letter reduced this by \$2,563.72 for an Adjusted Commitment of \$20,817.04 of which \$21,728.50 was disbursed. The funds to be recovered from the Service Provider would be \$911.46.

The letter did not really indicate what was wrong but after contacting the reseller, Interactive Digital Solutions (IDS), we were informed that the the LifeSize Team 220 CODEC, that IDS quoted at a 92% eligibility was deemed in a later review to be at a 75% eligibility discount. IDS acknowledged that they would return the \$911.46 that was requested but then stated that it was the school's responsibility to pay them the \$911.46 plus any difference in the revised product eligibility amount. We signed a contract agreeing to one price but now are told that price has changed. We asked several times why they quoted the device at 92% eligibility, if it was not.

We believe that we have a contract issue, as IDS quoted us a price based on their posted eligibility discount percentage (not our discount percentage which is not guaranteed). If the product was at a 75% eligibility discount at that time of our RFP, then that eligibility discount percentage and the resultant cost should have been quoted. Nothing on the bid document stated that the price was a projection or subject to change.

However, as above, the vendor threatened that we need to pay the difference or it would constitute a program violation, since we would in effect be taking free goods. We disagree. We did not accept the contract with any promise of free goods or services. An error in their quoted price should not result in additional costs to the school years after the accepted contracted price. In fact, one might see this practice as tainting the bid evaluation process, as the IDS bid may not have been successful had they quoted the higher cost at that time.

BADR School
539 Bergen Avenue
Jersey City, NJ 07304
(201) 435-1075

In our pursuit to ascertain why/when the eligibility discount changed, we had a series of exchanges and requests for documentation from the vendor who eventually passed us onto the manufacturer, LifeSize. We have attached those email exchanges as support.

During those exchanges, it became apparent that the eligibility 92% discount for this device in the IDS bid reflected the eligibility discount percentage that was promoted by LifeSize, through their literature. However, that discount was falsely promoted. It was, as it turns out, 75%.

Additionally, it appears that the SLD and LifeSize had several contacts at that time, through the PIA review process. The LifeSize person informed us that they worked directly with the SLD to assure the 92% eligibility but, since we made a Correctional SPIN Change, we slipped through the cracks. Her email stated: *"One thing to consider is that the discount percent moved from 75% to 92% in late 2011. If indeed this was a SPIN change then the SLD went back to the original eligibility of 75% which would have been in effect when the original 471 was completed. If this would have gone through the regular PIA review I would have been able to have the discount changed the 92%."* This underscores that the company was aware that the 92% eligibility that they promoted was not in effect when IDS submitted their bid in March of 2011.

The fact that the regular PIA review used the submitted IDS bid with LifeSize equipment and approved it at the 92% was irrelevant to her. Since she was not able to intercept the review, we were out of luck.

If, in fact, SLD did perform the discount eligibility changes described above, and in the attached documentation, then that same adjustment must be offered to us.

In summary, we would like to affirm that a contract price stands firm and that an error in a quoted price is understood as a contract issue, not a program violation. We also respectfully request that the decision on FRN 2173740 be reversed and that BADR be allowed the same eligibility discount as other entities that applied for this device in that funding year. The standard should be the same for all.

Sincerely,



Martin Friedman
Consultant
BADR School

friedman@alemarconsulting.com

From: Cindy Joffrion cjoffrion@lifesize.com
Subject: RE: BADR School FRN 2173740 - Lifesize Team 220 Eligibility Issue
Date: August 9, 2014 at 7:00 PM
To: Martin Friedman friedman@ALEMARConsulting.com
Cc: Margo Hurwitz margo@alemarconsulting.com, grants@lifesize.com

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FCC Mail Room

Hi Martin,

I would not go so far as to say the discount was misquoted because it was a good faith estimate that was determined by IDS and Lifesize. The during the PIA process the SLD allowed the 92% discount for all PIA's that we were a part of. In this case because of the SPIN change we were not able to provide additional details and have the discount raised. Please be mindful that we labeled everything estimate and the SLD can decide outside of our recommended eligibility.

Let me run this by our legal department to see if they have a recommendation.

I will get back to you at the beginning of next week. Feel free to call me anytime if you need additional information.

Cindy

Cindy Joffrion Ph.D.

Sr Program Manager Government, Education and Medical Services
Lifesize

(W) 877-233-1701 | (C) 713-419-9721

(Video) cjoffrion@lifesize.com

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From: Martin Friedman [<mailto:friedman@ALEMARConsulting.com>]
Sent: Saturday, August 09, 2014 6:02 PM
To: Cindy Joffrion
Cc: Margo Hurwitz; grants
Subject: Re: BADR School FRN 2173740 - Lifesize Team 220 Eligibility Issue

Attached is a copy of the Corrective SPIN Change, dated 05/29/2013. Although the reviewer had the IDS quote, last contact in May 2012, he never changed the SPIN. We did so prior to moving the project forward.

The bid is signed by IDS on 2/6/2011 and the school accepted it on 3/8/2011. The 471 was filed on 3/15/2011.

As this was a Correctional SPIN change, the original 471 would always be in play.

March of 2011 would not be considered late 2011. Am I to understand that the percentage was indeed 75% at the time the bid was submitted?

Also, the PIA reviewer did accept the 92% discount. It was post-invoicing where the discrepancy was discovered.

If, as you state, the discount was at 75% prior to the filing of the 471, then the discount was misquoted on the bid and we have little recourse in an appeal to USAC.

Might you be able to suggest another approach?

martin

On Aug 9, 2014, at 6:40 PM, Cindy Joffrion <cjoffrion@lifesize.com> wrote:

Hi Martin,

Normally USAC contacts me for each PIA review however in this case I was never contacted. I did review the original 471 and it indicates a different vendor with month to month services as does the FCDL. What I suggest is that we discuss the reason they have this FRN listed as being part of a SPIN change and then determine what we can do from there. Right now I am not comfortable producing a letter until I get more information.

One thing to consider is that the discount percent moved from 75% to 92% in late 2011. If indeed this was a SPIN change then the SLD went back to the original eligibility of 75% which would have been in effect when the original 471 was completed. If this would have gone through the regular PIA review I would have been able to have the discount changed the 92%.

I would be open to a discussion to see if we can determine next steps.

Thanks,

Cindy

Cindy Joffrion Ph.D.

Sr Program Manager Government, Education and Medical Services
Lifesize

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From: Martin Friedman [<mailto:friedman@ALEMARConsulting.com>]

Sent: Saturday, August 09, 2014 4:57 PM

To: Cindy Joffrion

Cc: Margo Hurwitz

Subject: Re: BADR School FRN 2173740 - LifeSize Team 220 Eligibility Issue

Cindy,

Attached is the copy of the IDS quote that was used for this project. The quote I had digitized was a poor copy so when the USAC reviewer asked for a clearer copy, IDS sent the document I've attached.

Also attached is the page from the Funding Decision Commitment letter for this FRN. You can see that the request was reduced to match the amount on the bid from the Extended Price total of \$31,802.63 to \$25,978.62 to match the Eligible Cost column on the bid.

The LifeSize Team 220 is the item under question. Unit Price is listed as \$10,799.10 with a 92% eligibility discount, making the eligible cost \$9,935.17. USAC is stating that the eligibility discount is at 75%, making only \$8,099.33 eligible, a difference of \$1,835.85.

A USAC 92% discount would make the school eligible for the difference of cost and eligibility, \$863.93 plus their 10% share of the eligible portion, \$993.52 for a total obligation of \$1,857.45, which, of course, they accepted. A USAC 75% discount would make the school eligible for the difference of cost and eligibility, \$2,699.77 plus their 10% share of the eligible portion, \$809.93 for a total obligation of \$3,509.70. The difference to the school would be \$1,652.25, a cost they would have had the opportunity to consider at the bid opening, not months later after install.

These numbers do not match what USAC is listing s the Commitment to Be Rescinded. That amount is \$2,563.72 for which they are asking \$911.46 to be returned to them. That is \$726.87 over the \$1,835.85 difference between the 92% and 75% eligibility amounts. The difference, according to the Rescind Letter, is a prorated portion of the installation (\$9,235.98) about a 7.9% deduction. There is no indication how they came up with the prorating.

So, IMHO, to argue "the vendor quoted us this" is non-productive. We would need to show that the discount was correct and notification of any change was absent.

I hope this helps.

martin

On Aug 9, 2014, at 1:48 PM, Cindy Joffrion <cjoffrion@lifesize.com> wrote:

Hi Martin,

I will be traveling and I do hit a dead zone every once in a while. Please call me at 713-419-9721. If I don't answer just leave a voice mail and I will call you right back.

Cindy

From: Martin Friedman [<mailto:friedman@ALEMARConsulting.com>]

Sent: Saturday, August 09, 2014 8:46 AM
To: Cindy Joffrion
Cc: Pat Cassella; Tom Lewis; Amy Wilson; Tim Moran; Margo Hurwitz
Subject: Re: BADR School FRN 2173740 - LifeSize Team 220 Eligibility Issue

I will call on Monday around 10A. Is that OK?

On Aug 8, 2014, at 7:25 PM, Cindy Joffrion <cjoffrion@lifesize.com> wrote:

Hi Martin,

Please call when you can and I will try to get you the information you need. This is the only issue like this we have encountered so I am hoping we can help.

Thanks,

Cindy

Cindy Joffrion Ph.D.

Sr Program Manager Government, Education and Medical Services
Lifesize

(W) 877-233-1701 | (C) 713-419-9721

(Video) cjoffrion@lifesize.com

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From: Martin Friedman [<mailto:friedman@ALEMARConsulting.com>]
Sent: Friday, August 08, 2014 5:23 PM
To: Cindy Joffrion
Cc: Pat Cassella; Tom Lewis; Amy Wilson; Tim Moran; Margo Hurwitz
Subject: Re: BADR School FRN 2173740 - LifeSize Team 220 Eligibility Issue

Hi Cindy,

IDS sent a bid to the school claiming that the quoted devices had a certain percent eligibility discount with the program. It is clear to us that they took that information from materials that LifeSize provided to them. When the school accepted the bid, they did so accepting the costs presented on the quote and contract.

One would expect LifeSize to have provided USAC with information on your products and to have received some notification of the eligibility discounts in order for LifeSize to have included that discount information in those materials. One would also expect that USAC would have notified LifeSize if there was any change in the discount status so that LifeSize could either argue

the change or to publish the revised eligibility discount amounts in all future LifeSize materials.

To simply appeal to USAC that IDS quoted the device at a certain price and with a certain eligibility discount, IMHO, goes nowhere, especially since that was the thrust of IDS' appeal to USAC. USAC simply stated that the eligibility discount that they stated was wrong.

To support that there actually was an established discount for this equipment we would need to show that there was an agreed discount assigned by USAC. This information is not available to the public. The only way to obtain it is to go to the source, in this case LifeSize, who should have some official confirmation that USAC accepted the eligibility discount for this device. It is this document that we seek.

Since there would need to be some confirmation of the eligibility discount, one would also expect notification if there was any change to that agreement. If LifeSize was never notified of any change or intent to change, then a statement confirming that would be the 2nd document we would need.

We would establish the eligibility discount confirmation and that no change had ever been made, placing the burden of proof on USAC as to when and why those terms changed. If we lose with USAC, that is a strong argument to the FCC.

Of course, we are open to entertain any other line of argument that will bring about the results we are seeking.

martin

On Aug 8, 2014, at 1:49 PM, Cindy Joffrion <cjoffrion@lifesize.com> wrote:

Hi Martin,

Can you provide a reference as to where I can obtain information stating the USAC was supposed to negotiated and notify us of the discount percentage prior to the 2013? I would like to use that in a letter to the Director of USAC. Once I get that information I can have a letter send out by legal today.

Thanks,

Cindy

From: Martin Friedman [<mailto:friedman@ALEMARConsulting.com>]

Sent: Friday, August 08, 2014 12:37 PM

To: Cindy Joffrion

Cc: Pat Cassella; Tom Lewis; Amy Wilson; Tim Moran; Margo Hurwitz

Subject: Re: BADR School FRN 2173740 - LifeSize Team 220 Eligibility Issue

Thanks, Cindy.

There is an eRate State Coordinator for your state who might be able to help you with that USAC contact. I suggest that you also relate the larger issue for comment.

martin

On Aug 8, 2014, at 1:28 PM, Cindy Joffrion <cjoffrion@lifesize.com> wrote:

Hi Martin,

I would not infer any information from my answer other than I don't have any documentation.

Typically, we are not given the ability to negotiated with USAC other than providing them with recommendations. Our eligibility list contains verbiage that USAC has the ability to determine discount percentages and the lists are just for reference. In the past, I have not received any documentation and have always loaded the information on the SLD website database section. The database is still visible on the SLD website however it contains the old percentage. I did call the SLD and tried to get documentation however they said that they do not send out documentation to verify percentages to manufacturers and were not clear on what was needed. If you have a contact with the SLD I would be happy to call to obtain any letters you need.

I see that equipment has already been purchased and distributed so I would not be able to discount it to compensate for the \$911. Let me check to see if I can take the amount out of my budget...no promises however I will ask.

Lastly, I will refer this matter to our legal counsel to see if they have any information that might be useful.

Cindy

From: Martin Friedman [<mailto:friedman@ALEMARConsulting.com>]

Sent: Friday, August 08, 2014 11:27 AM

To: Cindy Joffrion

Cc: Pat Cassella; Tom Lewis; Amy Wilson; Tim Moran; Margo Hurwitz

Subject: Re: BADR School FRN 2173740 - LifeSize Team 220 Eligibility Issue

Hi Cindy, thanks for responding so quickly.

Might someone have a screenshot of that website nostino?

might someone have a screenshot of that website posting.

Also, can we infer from your response that LifeSize was unaware of any challenge to that approved eligibility percentage?

Lastly, the amount of funds that USAC is requesting to be returned amounts to \$911.46.

regards

martin

On Aug 8, 2014, at 12:10 PM, Cindy Joffrion <cjoffrion@lifesize.com> wrote:

Hello All,

I have no documentation from USAC at all until 2013. The process was that we submitted to the database file and if approved it was posted on the website. I am not sure how I can provide information to help however I will check with our legal department. How much is the difference that the customer had to pay? It might just be easier to deal with the cost difference.

C.

From: Pat Cassella [<mailto:pcassella@e-idsolutions.com>]
Sent: Friday, August 08, 2014 9:32 AM
To: Martin Friedman; Cindy Joffrion
Cc: Tom Lewis; Amy Wilson; Tim Moran; Margo Hurwitz; Pat Cassella
Subject: BADR School FRN 2173740 - LifeSize Team 220 Eligibility Issue

++Cindy

Hi Cindy,

I hope all is well.

I know Tom reached out to you for help.

See Martin's email below.

Can you please help us with proof that the Lifesize Team 220 was 92% eligible during the time we filed our paperwork with the school?

Thanks in advance

Pat

Pat Cassella | VP of Marketing and Video Sales | IDSolutions, Inc.
203-479-3506 voice | 203-980-6928 cell
<http://www.e-idsolutions.com>

Your Trusted Video Integration Partner

<image001.jpg><image002.jpg><image003.jpg><image004.jpg>

From: Martin Friedman [<mailto:friedman@ALEMARConsulting.com>]
Sent: Friday, August 08, 2014 10:11 AM
To: Pat Cassella
Cc: Tom Lewis; Amy Wilson; Tim Moran; Margo Hurwitz
Subject: Re: BADR School FRN 2173740 - LifeSize Team Eligibility Issue

Pat,

What you have provided is material from LifeSize that advertises the eligibility discount for the devices. Naturally, you rely on them to construct your quotes/bids for clients.

Since USAC has challenged the discount rate for the device at issue, we need to show USAC that they agreed to this discount with LifeSize and/or changed that discount at some point.

As a reseller, you would not have the USAC documents that support the advertised eligibility discounts offered by LifeSize, but that is what we need. The eligibility discount level was negotiated by LifeSize with USAC then advertised to IDS (and others).

To prove our point, that the eligibility discount was at 92% at the time you submitted your bid, during the USAC review, and up to the time you installed the device. And that you (LifeSize) were never notified that there was an issue with the discount rate or that it had changed.

To do this, we need 1) official USAC communication with LifeSize that shows USAC confirms the 92% eligibility discount level for this device. That is a USAC document, not a LifeSize document. We also need 2) any documentation from LifeSize reflecting any change or challenge to that discount by USAC, or, if none, a statement from LifeSize stating that USAC never notified them of any challenge or change in the agreed discount for this product.

Those two points of argument is what will demonstrate to USAC that an error has been made. Otherwise we would simply be stating that IDS (or LifeSize) told us it was 92% for which they will respond by stating that we were misquoted the issue is with either IDS or LifeSize (which is the reason they are requesting the funds from IDS and not BADR.)

I feel that I am repeating myself over and over (redundancy intended). Are you clear on what we need to win the appeal?

martin

On Aug 8, 2014, at 8:14 AM, Pat Cassella <pcassella@e-idsolutions.com> wrote:

Martin – we have reached out to Lifesize's E-Rate expert.

Attached find a couple of emails directly from Lifesize with the eligibility lists that we provided to you earlier.

IDS does not create these sheets; they are created by Lifesize and then provided to IDS via email communication.

I want to note that Lifesize used to physically email the sheets; now they send a link that points to the latest sheet.

Was there something specific that you were hoping Lifesize would provide other than this?

Pat

Pat Cassella | VP of Marketing and Video Sales | IDSolutions, Inc.
203-479-3506 voice | 203-980-6928 cell
<http://www.e-idsolutions.com>

Your Trusted Video Integration Partner

<image001.jpg><image002.jpg><image003.jpg><image004.jpg>

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Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2011-2012

October 13, 2014

Martin Friedman
ALEMAR Consulting, Inc.
442 Lyndhurst Drive
Broomall, PA 19008

Re: Applicant Name: BADR SCHOOL
Billed Entity Number: 208844
Form 471 Application Number: 801449
Funding Request Number(s): 2173740
Your Correspondence Dated: September 16, 2014

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2011 Notification of Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2173740
Decision on Appeal: **Denied**
Explanation:

- Your FCC Form 471 application included costs for the following ineligible product, SKU 1000-0000-1130 Lifesize Team 220, which is 25% ineligible for FY 2011. Your funding request was reduced in accordance with USAC's determination. On July 29, 2014 a Commitment Adjustment Letter was issued explaining this modification. In your appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.
- FCC rules provide that funding may be approved only for eligible products and services. See 47 C.F.R. secs. 54.502. The USAC website contains a list of eligible products and services. See USAC website, www.usac.org/sl, Eligible Services List. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding

request must be denied, otherwise the funding request will be reduced accordingly. *See* 47 C.F.R. sec. 54.504(b). The FCC's Aiken County Public Schools Order directed USAC to permit the applicant 15 calendar days from the date of receipt of notice in writing by USAC to revise its funding request to remove the ineligible services or allow the applicant to provide additional documentation to show why the services are eligible. *See* Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools Aiken, SC, et al., Schools and Libraries Universal Service Support Mechanism. File No. SLD-397612, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8735, FCC 07-61 para. 11 (May 8, 2007).

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

cc: Eman Ahmed